

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

Terri Pepper,

Plaintiff,

Case No. 4:20-cv-02621

v.

**Hard Tack, LLC d/b/a Dealer Renewal
Services, et. al.,**

Defendant.

**PLAINTIFF’S MOTION FOR DEFAULT JUDGMENT AGAINST HARD TACK, LLC
D/B/A DEALER RENEWAL SERVICES AND PAYMENT PLANS PLUS, LLC**

Pursuant to Rule 55(b), Plaintiff, Terri Pepper (“Plaintiff”), hereby requests entry of a default judgment against Defendant Hard Tack, LLC d/b/a Dealer Renewal Services (“Hard Tack”) and Payment Plans Plus, LLC (“PPP”).

On July 24, 2020, Plaintiff filed her Complaint in the above-captioned proceeding. [ECF No. 1]. Service of Summons and Complaint on Defendant Hard Tack was effected on August 6, 2020 [ECF No. 15]. Proof of service was filed with the Court on August 21, 2020 [ECF No. 15]. Accordingly, Hard Tack’s answer was due on August 27, 2020. Because no such answer was filed, on September 17, 2020, Plaintiff moved for an entry of default. [ECF No. 22.] That motion was granted on October 22, 2020. [ECF No. 27.]

Likewise, Defendant PPP was served on August 17, 2020, and proof of service was filed on August 19, 2020. [ECF No. 13.] Where PPP’s answer was due September 9, 2020, no answer was filed. Accordingly, on September 17, 2020, PPP moved for default. [ECF No. 23.] The Court entered that default on October 22, 2020. [ECF No. 28.]

For the reasons stated in Plaintiff's supporting memorandum of law, Plaintiff requests the Court enter default judgment against Defendant Hard Tack and Defendant PPP, jointly and severally in the amount of \$70,465.50.

DATED this 15th Day of February, 2021.

Dated: 02/15/2021

Respectfully submitted,

By: s/ Amy L. Bennecoff Ginsburg
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CERTIFICATE OF SERVICE

I, AMY L. B. GINSBURG, ESQUIRE, hereby certifies that a true and correct copy of the default judgment motion was electronically filed with the Clerk of Court. A copy was also sent via U.S. Mail to Defendant Hard Tack at the following address:

HARD TACK, LLC d/b/a DEALER RENEWAL SERVICES
3300 S. Dixie Hwy, #1-142,
West Palm Beach, Florida, 33405

RESPECTFULLY SUBMITTED,

Date: February 15, 2021

By: /s/ AMY L. B. GINSBURG
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